



National Association of State EMS Directors

Note our NEW ADDRESS as of May 12, 2003:

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September 9, 2003

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

The National Association of State EMS Directors (NASEMSD) would like to express its support for the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO) and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies.

If not changed, the “near-term” dates and requirements will prevent public safety licensees from adding critical capacity and coverage for existing systems, locking them into current channels and equipment supplies, or forcing them to expend scarce resources to replace prematurely their entire radio systems. Therefore, the rules must be modified to ensure that, pending the final conversion date, public safety agencies will continue to have the necessary flexibility to modify and add to their radio systems to accommodate changing public safety operational requirements.

Respectfully submitted,

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Leslee Stein-Spencer
NASEMSD President-Elect

cc: Robert Gurss, APCO, Director of Legal and Government Affairs